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Attorney for Debtor
William Kwok Wai Wong

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re William Kwok Wai Wong aka Kwok
Wai Wong, aka William Wong

Debtor

) BK No.: 13-41150

) ADV. No.: 13-04114

) Chapter 7

Ning Liu

Plaintiff,

v.

William Kwok Wai Wong aka Kwok Wai
Wong, aka William Wong,

Defendant.

) DEFENDANT'S ANSWER TO
) COMPLAINT TO DETERMINE
) DISCHARGEABILITY OF DEBT

) STATUS CONFERENCE:

) Date: September 10, 2013

) Time: 1:30 pm

) Place: 1300 Clay Street, Room 201
) Oakland, CA 94612

Defendant answers Plaintiff's Complaint as follows:

1. Defendant admits allegations 1, 4, 6, 7, and 19.
2. Defendant has insufficient information and/or belief regarding the allegations 2, 3, 5, 8, 9, 10, 11, 14, 16, 17, 18, 20, 23, 24, 26, 28, and 35 and on that basis denies said allegations.

3. Defendant denies allegations 12, 13, 15, 21, 22, 25, 27, 29, 30, 31, 32, 33, and 34.
Further, as separate affirmative defenses to each and every claim for relief of the complaint, this
Answering Defendant is informed and believes, and on such information and belief alleges as
follows:

FIRST AFFIRMATIVE DEFENSE

The Complaint on file therein fails to state facts sufficient to constitute each and every
cause of action under 11 USC §523(a)(2)(A) and 11 §532(a)(6) against the answering Defendant.

SECOND AFFIRAMTIVE DEFENSE

The breach of contract portion of the judgment entered in Superior Court case no.
RG08421861 in the amount of \$311,000 is not subject to nondischargeability under 11 USC
§523(a)(2)(A).

THIRD AFFIRMATIVE DEFENSE

The Complaint on file therein fails to establish the collateral estoppel effect of the state
court judgment regarding intentional infliction of emotional distress, fraud, and punitive
damages to determine nondischargeability under 11 USC §523(a)(2)(A) and 11 §532(a)(6).

FOURTH AFFIRMATIVE DEFENSE

The award of punitive damages in the amount of \$410,000 in the state court judgment
does not constitute proof of malicious injury under 11 USC §523(a)(6).

FIFTH AFFIRMATIVE DEFENSE

Defendant alleges that Plaintiff is barred from seeking the relief requested in the
complaint under the equitable doctrines of waiver, estoppel and unclean hands.

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ELEVENTH AFFIRMATIVE DEFENSE

Defendants presently have insufficient knowledge or information on which to form a belief as to whether they may have additional, as yet unstated, affirmative defenses available. Defendants reserve the right to assert additional defenses in the event that discovery indicates that they would be appropriate.

Defendants presently have insufficient knowledge or information on which to form a belief as to whether they may have additional, as yet unstated, affirmative defenses available. Defendants reserve the right to assert additional defenses in the event that discovery indicates that they would be appropriate.

The Complaint on file therein fails to establish the collateral estoppel effect, if any, of the \$800,000 punitive damages portion of the 2nd claim pending trial as there is no final judgment on the merits.

1. That Plaintiff take nothing by reason of its complaint, and that judgment be rendered in favor of Defendant;
2. That Defendant be awarded costs of suit incurred in the defense of this action; and
3. For such other and further relief as the court deems just and proper.

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UY LAW GROUP

Dated: June 26, 2013

/s/ Lien L. Uy

Lien L. Uy, Esq.
Attorney for Defendant
William Kwok Wai Wong

PROOF OF SERVICE

I, Alison Ma, declare:

I am over the age of 18 and not a party to the within action; my address is 436 14th Street, #1213, Oakland, CA 94612. I served the within the legal document(s) on the following person(s) on the date set forth below as follows:

Documents Served: DEFENDANT'S ANSWER TO COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT

Persons Served: Stephen Benda
Law Offices of Stephan Benda
750 Menlo Avenue, #350
Menlo Park, CA 94025-4759

Date Served: June 26, 2013

X BY MAIL: I served the within legal documents by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Oakland, CA.

___ BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the office(s) of the addressee(s).

___ BY FAX: I caused a copy of such document to be sent via facsimile to the office(s) of the addressee(s).

I declare under penalty under the laws of the State of California that the foregoing is true and correct.

Executed at Oakland, California on June 26, 2013

/s/ Alison Ma

Alison Ma